

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

The United States of America,
ex rel. Alicia Strickland and
Paige Purcell,

Plaintiffs,

v.

Drayer Physical Therapy Institute, Chris Fisher,
Jeff Fromdahl, Brad Keisling, Melissa Zink
and Tyrone Delmonico,

Defendants.

CA No.: 9:13-cv-01781

FILED UNDER SEAL

**JOINT STIPULATION OF DISMISSAL OF ALL CLAIMS
BROUGHT ON BEHALF OF THE UNITED STATES AGAINST DRAYER PHYSICAL
THERAPY INSTITUTE**

Pursuant to Rule 41(a)(1) of the Federal Rules of Procedure and the qui tam provisions of the False Claims Act 31 U.S.C. § 3730(b)(1), and in accordance with the terms of this settlement agreement between the United States, Relators and Defendant Drayer Physical Therapy Institute, the United States, on behalf of the United States and the Relators, stipulate to the entry of an order: (1) dismissing all claims brought on behalf of the United States with prejudice as to the United States for the claims against Drayer Physical Therapy Institute within the Covered Conduct released in the Settlement Agreement, and without prejudice as to any other claims; and (2) dismissing with prejudice as to the Relator for all claims brought on behalf of the United States against Drayer Physical Therapy Institute.

The United States and Relator respectfully request that the Court enter an order in the form of the attached proposed order dismissing all claims brought on behalf of the United States.

This Stipulation does not seek the dismissal of the claims brought by the Relators' against the individual defendant or for costs, reasonable expenses and attorney fees against Drayer Physical Therapy Institute.

Respectfully submitted,

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